

March 20, 2020

VIA ECF

The Honorable Lorna G Schofield
United States District Court for the Southern District of New York
40 Foley Square
New York, NY 10007

Jane Doe, et al. v. Trump Corp., et al., 1:18-cv-9936 (LGS)

Dear Judge Schofield:

We write on behalf of both parties, and pursuant to the Court's Order dated March 13, 2020 (Doc. No. 198), to update the Court on the status of our discussions with respect to Plaintiffs' request for organizational charts and/or other discovery relating to the positions of relevant individuals in the above-referenced action. Following the Court's March 13 Order, Plaintiffs worked to narrow their original requests in a letter to Defendants dated March 16, 2020, and further narrowed those requests following a meet-and-confer yesterday, March 18, 2020. Following those discussions, the parties are pleased to report that we have reached the following initial agreement:

I. ORGANIZATIONAL INFORMATION AT THE INDIVIDUAL LEVEL

Defendants will produce documents sufficient to identify, for each of the following individuals from January 1, 2013 to October 29, 2018: (1) the relevant individuals' title(s) and position(s); (2) the person(s) to which such individual reported; (3) the relationship between and among such individual and each Defendant; and (4) the time period applicable to each such piece of information:

- Allen H. Weisselberg;
- George A. Sorial;
- Rhona C. Graff;
- Jason D. Greenblatt;
- Lynne M. Patton;
- Eleonor Content;
- Amanda Miller;
- Hope Hicks;
- Phil O'Grady;
- Owen Reidy;
- Katherine Murphy;
- Meredith McIver;
- Corey Lewandowski;
- Jessica Macchia;
- Alex Cannon; and
- Kelly Shea.

Defendants have also agreed to produce documents sufficient to show the same information for additional, relevant individuals affiliated with The Trump Organization that Plaintiffs may identify in the future based on further discovery (subject to discussion between the parties on who is a relevant employee).

II. ORGANIZATIONAL INFORMATION AT THE ENTITY LEVEL

Defendants will undertake a reasonable search for documents sufficient to show, or will state for Plaintiffs in writing if it is more efficient to do so, for each of The Trump Corporation, Trump Productions, LLC, and Trump Productions Managing Member, Inc.:¹

- (1) whether any Defendant was a direct or indirect owner of such entity, and if so the percentage or share of the entity directly or indirectly owned by each Defendant; and
- (2) whether any Defendant exercised control over such entity, including whether any Individual Defendant was an officer, director, or executive of such entity.

The parties have initially agreed that Defendants will provide this information from January 1, 2017 to the present, and, to the extent available, from January 1, 2013 to December 13, 2016.

* * *

The parties have not reached agreement with respect to the provision of organizational information for the period prior to January 1, 2013, and expect to address that issue as they continue to meet and confer about expanded date ranges more generally. We look forward to providing an update to the Court on those discussions and additional outstanding issues in our next joint letter due to be filed on March 27, 2020.

Respectfully submitted,

¹ Plaintiffs have also reserved the right to identify other relevant Trump entities as Plaintiffs discover additional information.

/s/ Roberta A. Kaplan

Roberta A. Kaplan
John C. Quinn
Alexander J. Rodney

KAPLAN HECKER & FINK LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118
Telephone: (212) 763-0883
Facsimile: (212) 564-0883
rkaplan@kaplanhecker.com
jquinn@kaplanhecker.com
arodney@kaplanhecker.com

Andrew G. Celli, Jr.
Matthew D. Brinckerhoff
O. Andrew F. Wilson
Katherine Rosenfeld
David Berman
Nick Bourland

EMERY CELLI BRINCKERHOFF & ABADY LLP
600 Fifth Avenue at Rockefeller Center
New York, NY 10020
Telephone: (212) 763-5000
acelli@ecbalaw.com
mbrinckerhoff@ecbalaw.com
awilson@ecbalaw.com
krosenfeld@ecbalaw.com
dberman@ecbalaw.com
nbourland@ecbalaw.com

Attorneys for Plaintiffs

/s/ Joanna C. Hendon

Joanna C. Hendon
Cynthia Chen
Andrew L. Kincaid

SPEARS & IMES LLP
51 Madison Avenue
New York, New York 10010
Telephone: (212) 213-6996
Facsimile: (212) 213-0849
jhendon@spearsimes.com
cchen@spearsimes.com
akincaid@spearsimes.com

Attorneys for Defendants